

## **PRIVACY ASSESSMENT COMPONENTS**

### **1. Impact Assessment**

- Identify Entity
- Create assessment tool

### **2. Privacy Officer**

- Define role and responsibility

### **3. Laws, Policy, Procedures**

- Identify impacted  
State and federal laws, and  
Dept. policies and procedures
- Pre-emption Issues

### **4. Minimum Use/Disclosure**

- Identify current processes
- Analyze minimum necessary
- Website notice/ use

### **5. Applied Use/Disclosure**

- Identify requirements
- Research
- Marketing
- Disclosure required by law
- Public Health
- De-identified information
- Linked data sets

### **6. Individual Rights**

- Define Opt Out, Access, accounting, and amendment rights
- Identify system requirements for accounting and Opt Out

### **7. Notice, Consent, and Authorization**

- Identify current practices
- Define notice, consent and authorization requirements

### **8. Business Associates**

- Identify Business associates
- define contract requirements

### **9. Education and Awareness**

- Identify education requirements

## **PRIVACY IMPLEMENTATION COMPONENTS**

### **Privacy Officer**

### **Laws, Policy, Procedures**

- Change impacted  
Dept. policies and procedures

### **Minimum Use/Disclosure**

- Implement process, policy, job description, technical changes

### **Applied Use/Disclosure**

- Implement process changes

### **Individual Rights**

- Identify process options and implement option and policy
- Perform system changes for tracking, opt out, amendment

### **Notice, Consent, and Authorization**

- Develop Forms

### **Business Associates**

- Change contracts

### **Education/Awareness**

- Design education requirements
- Implement education

PRIVACY ISSUES LOG	
<b>1. Impact Assessment</b>	
	Health plan - Excepted Benefits definition at 42 USC 300gg
<b>2. Privacy Officer</b>	
<b>3. Laws, Policy, Procedure</b>	
<b>4. Minimum Use / Disclosure</b>	
<b>5. Applied Use/ Disclosure</b>	
<b>6. Individual Rights</b>	
<b>7. Notice, Consent, Authorization</b>	
<b>8. Business Associates</b>	
<b>9. Education and Awareness</b>	